

Submission on Tasmanian Liquor Licensing Reforms

December 2025



About FARE

The Foundation for Alcohol Research and Education (FARE) is the leading not-for-profit organisation working towards an Australia free from alcohol harms.

We approach this through developing evidence-informed policy, enabling people-powered advocacy and delivering health promotion programs.

Working with local communities, values-aligned organisations, health professionals and researchers across the country, we strive to improve the health and wellbeing of everyone in Australia.

To learn more about us and our work visit www.fare.org.au.

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Executive summary

All people in Tasmania should have the opportunity to be healthy, safe and free from the many ways that alcohol causes harm to people, families and communities. Yet alcohol continues to contribute to chronic diseases like cancer, to domestic, family and sexual violence, disability, homelessness, self-harm and suicide. Tragically, Australia has recently been experiencing the highest rates of alcohol-induced deaths in over 20 years.¹

Alcohol is no ordinary commodity; it is a harmful product. Tasmania needs effective regulatory controls to address and reduce these harms. However, the laws that exist to keep people safe and protect them from harm have not kept pace with the way that alcoholic products are marketed, sold and delivered.

Alcohol is a significant contributor to gender-based violence in Australia, increasing its frequency and severity.² The *'Rapid Review of Prevention Approaches to End Gender-Based Violence'* recommended that State and Territory governments review and strengthen alcohol laws by adopting primary objectives to prevent gendered violence and by limiting alcohol sales and delivery timeframes and advertising, guided by the Rapid Review.³ The National Cabinet agreed to review alcohol laws and their impact on family and domestic violence.⁴

The Tasmanian Government has the power to keep women and children safe by better regulating alcohol promotion and availability. We welcome consideration of measures in the Tasmanian Government's *'Liquor Licensing Reforms'* consultation which can respond to the Rapid Review and National Cabinet, including:

- *"Considering and responding to the role that alcohol may play in contributing to family and domestic violence, by strengthening controls on alcohol access and availability.*
- *Better aligning regulation of online sales and delivery of liquor with premises-based sales and Providing requirements for delivery of liquor.*"⁵

Specific online sales and delivery reforms, which can help prevent gendered violence, include:

- Restrict delivery timeframes to between **10am and 10pm**, to reduce the risk of alcohol-related domestic, family and sexual violence and suicide, which increases later at night.
- Establish a **2-hour safety pause** between sale and delivery to prevent rapid delivery, which contributes to higher-risk alcohol use when drinking sessions are extended.
- Age verification for online sales of alcohol and effective ID checks on alcohol delivery.
- Offences: to sell alcohol to a person under 18 years of age; to leave an alcohol delivery unattended; and to deliver to people who are intoxicated.
- Collect data on refused deliveries and volume of alcohol deliveries, geographically.
- Support delivery staff with delivery-specific Responsible Service of Alcohol (RSA) training and ensure they are not penalised for refusals.

The reforms also need to adopt a key recommendation of the Rapid Review and South Australian Royal Commission on Domestic, Family and Sexual Violence: that is to include a reference to "gendered violence" in the definition of alcohol harm in the Act and to establish **harm minimisation as the paramount object** of the Act. This provides clarity of purpose, removes the conflict with competing objects in the Act, and confirms that preventing harm is the most important object.

Other proposed licensing reforms in the *'Liquor Licensing Reforms'* Fact Sheet, such as risk-based licensing, new license categories and an online trackable application process also have potential to improve regulation. However, 'streamlining and modernising' liquor regulation must not prioritise 'reducing regulatory burden' for industry at the expense of community safety. Proposed reforms must demonstrate evidence they will not increase community harm.

We thank the Tasmanian Government for the opportunity to provide feedback on these reforms.

Recommendations

FARE recommends:

1. Alcohol and gendered violence

Recommendation 1. Prioritise harm minimisation above other considerations, by making it the paramount object in “Object of Act” and include gender-based violence in the definition of alcohol harms in “Interpretation”.

2. Online sales and delivery (OS&D) of alcohol

Recommendation 2. Apply the scope of all online sales and delivery measures to all deliveries of alcohol, not just same day delivery.

Recommendation 3. Establish a delivery timeframe from 10am to 10pm to prevent late night delivery. This reduces the risk of alcohol-related domestic, family and sexual violence and suicide, which increases later at night.

Recommendation 4. Introduce a 2-hour safety pause between the order and delivery of alcohol. This prevents rapid delivery which contributes to higher-risk alcohol use when drinking sessions are extended.

Recommendation 5. Require digital proof of age, as an effective ID check for online point of sale. Require an effective ID check on every delivery.

Recommendation 6. Establish an offence for the selling of alcohol to people under 18 years old, (separate to the offence for delivering to people under 18 years old).

Recommendation 7. Establish an offence for leaving an alcohol delivery unattended. Establish an offence for delivering alcohol to a person who is intoxicated.

Recommendation 8. Require delivery staff to undergo *delivery-specific* Responsible Service of Alcohol (RSA) training. This ensures they are safe and understand their role, rights and responsibilities in refusing delivery of alcohol, as well as how to respond appropriately to potential family violence situations.

Recommendation 9. Clarify that delivery companies are liable for delivery breaches, (such as deliveries outside of hours or in breach of a 2-hour safety pause).

Recommendation 10. Prohibit delivery companies from imposing a penalty on employees or delivery agents for not completing a delivery, or for refusing delivery, in compliance with their legal obligations.

3. Risk-based licensing

Recommendation 11. Incorporate all risk factors of alcohol harm into the calculation of risk ratings and license fees, to ensure that risk-based licensing accurately reflects the risk of alcohol harm. These include business activity, trading hours, patron capacity, location (density and proximity), and compliance history.

Recommendation 12. Ensure that within risk-based licencing, higher risk licenses have increased license fees and stronger conditions, (not just lower risk licenses having reduced fees and conditions).

Recommendation 13. Incorporate both density and proximity risk factor calculations to accurately reflect the higher risks of higher venue density and proximity.

Recommendation 14. Establish a risk factor for online sales and delivery to accurately reflect the increased risk of harms. Incorporate a risk factor for supply density, (as an equivalent for outlet density), for online sales and delivery of alcohol in a geographic area. Consult alcohol policy experts on the development, implementation and evaluation of such a risk factor.

Recommendation 15. Ensure that any new license categories include additional community consultation requirements and evidence-based harm minimisation measures as conditions.

Recommendation 16. Commission independent research to determine the associated risks of harm from alcohol of different licence types and their conditions, before reducing or changing the license categories and subclasses.

Recommendation 17. Establish a separate, specific liquor licence category for OS&D. This is to align the administration, licence fees and conditions with the risk of alcohol harm associated with OS&D. Require retailers, such as bottle shops and third-party delivery companies, to have and display this license to sell alcohol online or to deliver alcohol.

4. Licensing and permit applications

Recommendation 18. Prescribe an effective community impact process for OS&D, publishing full licence applications with risk-assessment management plans specific to OS&D. Ensure engagement with all relevant stakeholders, by providing resourcing for targeted and independent support for members of the public impacted by increases in alcohol supply.

5. Licensing and permit conditions

Recommendation 19. Ensure that any changes to licensing and permit conditions have evidence that they will not increase the risk of harm from alcohol before being implemented.

6. Preventing harmful marketing

Recommendation 20. Extend the list of unacceptable promotional practices to the digital marketing of OS&D, including prohibiting retailers from offering delayed payment; sending direct prompts; 'buy-now' buttons or offering incentives for a minimum spend or volume.

Recommendation 21. Require alcohol companies with online advertising to clearly display on their websites at least three prescribed rotating health warning statements about the risk of harm from alcohol, with a link to the Australian guidelines to reduce health risks from alcohol.

7. Compliance and data

Recommendation 22. Require retailers to collect data and keep records on the volume of alcohol sold geographically. This data should include alcohol *sold* online as well as *delivered* by geographic area. Publish regular sales and delivery data reports to enable research and compliance monitoring of sales. Collect only *postcode data*, not names or addresses of individuals.

Recommendation 23. Require retailers to collect data and keep records on deliveries refused because the recipient was under 18, did not provide evidence of age or was intoxicated. Publish regular reports on compliance and enforcement to enable research and monitoring of deliveries and frequency of issues. As above, this measure should collect only *postcode data*, not names or addresses of individuals.

Recommendation 24. Implement, monitor and enforce compliance test purchasing including of OS&D. This is to test compliance of the prohibitions against delivering alcoholic products to people under 18, people who are intoxicated or deliveries being left unattended.

Significant and increasing harms from alcohol

Alcohol causes significant harm to Australians, with one person dying every 90 minutes and one person being hospitalised every three minutes because of alcohol.⁶ As well as contributing significantly to Australia's health burden, alcohol costs billions of dollars each year in Australia in terms of healthcare and non-healthcare economic costs.⁷ Tragically, Australia has been experiencing the highest rates of alcohol-induced deaths in over 20 years.⁸

Nearly 160 people in Tasmania die each year of alcohol-attributable disease and injury, and more than 2,600 hospitalisations in Tasmania are attributable to alcohol.⁹ Over a quarter (26.3%) of people in Tasmania exceed single occasion alcohol risk guidelines at least monthly.¹⁰ Alcohol is the most common drug for which people in Tasmania seek treatment (49%).¹¹

A recent *Harms to Others* study shows that alcoholic products also cause harm to the broader community. In the survey of over 2,500 adults, participants were asked about the impacts of alcohol use by people they interacted with – friends, housemates, strangers, partners, family members and colleagues.¹² Nearly half (48%) said they had experienced harm from another person's drinking, while 7.5% reported having been “*harmed substantially*”. This equates to almost 10 million adults a year harmed by others' alcohol use and more than 1.5 million experiencing serious harm.

1. Alcohol and gendered violence

The **Liquor Licensing Reforms Fact Sheet**¹³ proposes the following specific changes:

- “*Strengthening controls on alcohol access and availability to address the role that alcohol may play in family and domestic violence*”.

The increased availability of alcohol, especially late at night, increases the risk of harm, including gendered violence. The rapid growth of online sales and delivery of alcohol introduces new risks of alcohol harm, including increased availability, accessibility, density of alcohol supply, and rapid and unsupervised delivery. The report of the ‘*Rapid Review of Prevention Approaches to End Gender-Based Violence*’ noted: “**A failure to consider DFSV in alcohol policy, which has allowed unprecedented growth in alcohol availability, both in the density of liquor outlets and the length of online delivery hours. This increase in availability has been statistically linked to increases in alcohol-related DFSV.**”¹⁴

Alcohol is a significant contributor to gendered violence in Australia, increasing its frequency and severity. Between 2010 and 2018, over half (52%) of male intimate partner homicide offenders used alcohol at high-risk levels at the time of the homicide.¹⁵ Men's drinking results in direct, indirect and hidden harms to women that are cumulative, intersecting and entrench women's disempowerment.¹⁶ Changes in their partners' drinking play a central role in women's journey to safety and can complicate their ability to leave.¹⁷ Action on alcohol is an important part of any comprehensive approach to the prevention of violence against women and children.

National Cabinet and Rapid Review of prevention approaches

Following an initial National Cabinet meeting on gendered violence in May 2024, the Prime Minister announced an expert led ‘*Rapid Review of Prevention Approaches to End Gender-Based Violence*’. The Rapid Review report included specific recommendations for governments to adopt primary objectives to prevent gendered violence and to limit alcohol sales and delivery timeframes and advertising.¹⁸

National Cabinet then met in September 2024, to again discuss gendered violence, with the Prime Minister stating that tackling the impacts of alcohol on violence was a priority. He acknowledged the role of systems and industries in exacerbating violence. State and Territory

First Ministers agreed to review alcohol laws and their impact on family and domestic violence victims to identify and share best practice and reforms and to report back to National Cabinet on progress.¹⁹

Paramount object of harm minimisation and prevention of gendered-based violence

The harm minimisation object, and the community best interest principles of the Liquor Licensing Act, are the foundation of regulatory control of “the sale, supply, promotion and consumption of liquor”.²⁰ These harm minimisation and community interest protections must be prioritised. The current objects of the Act hold conflicting interests between harm minimisation and alcohol industry development. These conflicting interests challenge the Commissioner’s interpretation of alcohol harm risks when deciding on matters put before them. This establishes a false equivalence between community safety and industry profits.

The current Tasmanian Liquor Licensing Act does not include any definition of alcohol harms in ‘Interpretation’, omitting any reference to alcohol-related violence, such as gendered violence. Adopting gendered violence as a primary object in the Act provides greater clarity of purpose and removes the conflict existing in the Act with competing objects. This change is consistent with recommendation 128 of the SA Royal Commission into Domestic, Family and Sexual Violence.²¹ It also specifically adds the language of “gendered violence” into the Object of the Act, acknowledging the role that alcohol plays as risk factor contributing to gendered violence.

Recommendation 1. Prioritise harm minimisation above other considerations, by making it the paramount object in “Object of Act” and include gender-based violence in the definition of alcohol harms in “Interpretation.”

2. Online sale and delivery (OS&D) of alcohol

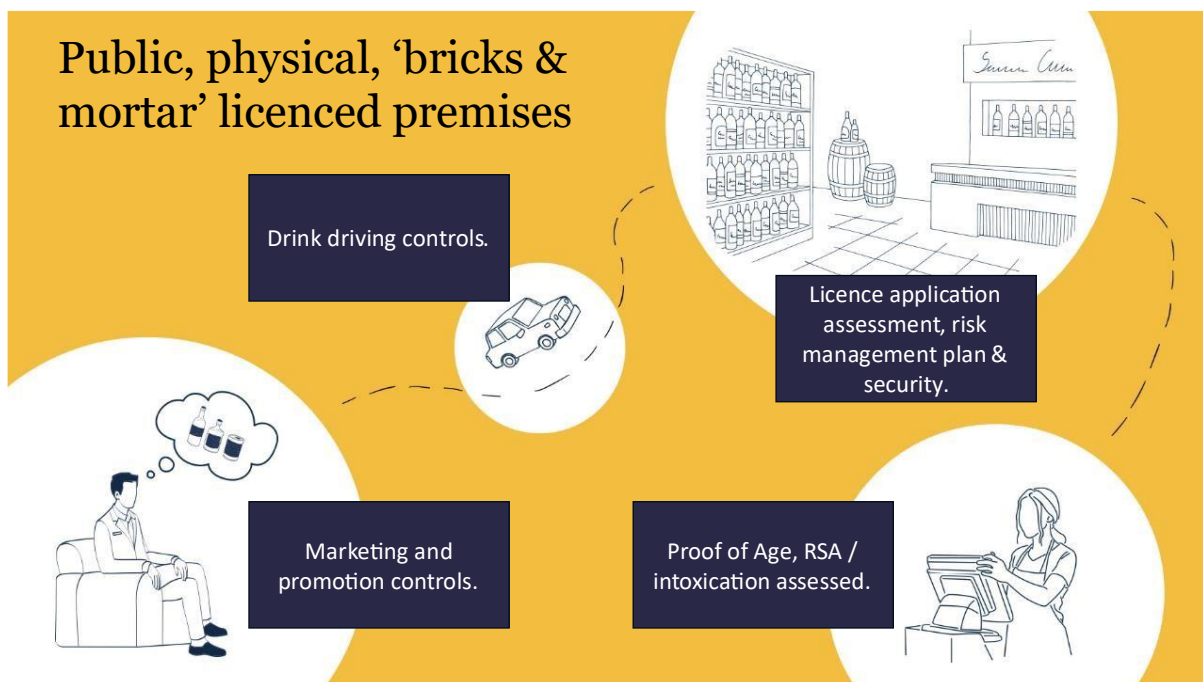
The **Liquor Licensing Reforms Fact Sheet** proposes the following specific changes:

- *“Better aligning regulation of online sales and delivery of liquor with premises-based sales*
- *Providing requirements for delivery of liquor and introducing the concept of supply of liquor”*

Rapid expansion of OS&D

Online alcohol retail sales have almost quadrupled from 2012 (\$539 million) to 2022 (\$2.0 billion). The revenue from online alcohol sales is forecasted to grow at an annual rate of 10.6% by 2026-27.²² In 2020, one in 10 Australians who bought takeaway alcohol purchased it online – a threefold increase from 2019.²³ Rapidly expanding OS&D is part of a move towards the digitisation of transactions. However, alcohol is no ordinary product like groceries or books. It is an addictive, carcinogenic drug that requires controls on how it is sold and delivered to protect communities from potential harm. Historically, regulations for the supply of alcohol in Tasmania were designed for ‘bricks-and-mortar’ premises. In a physical liquor outlet, the point of sale and the point of supply are combined in one transaction, with public and physical oversight, (see the diagram below).

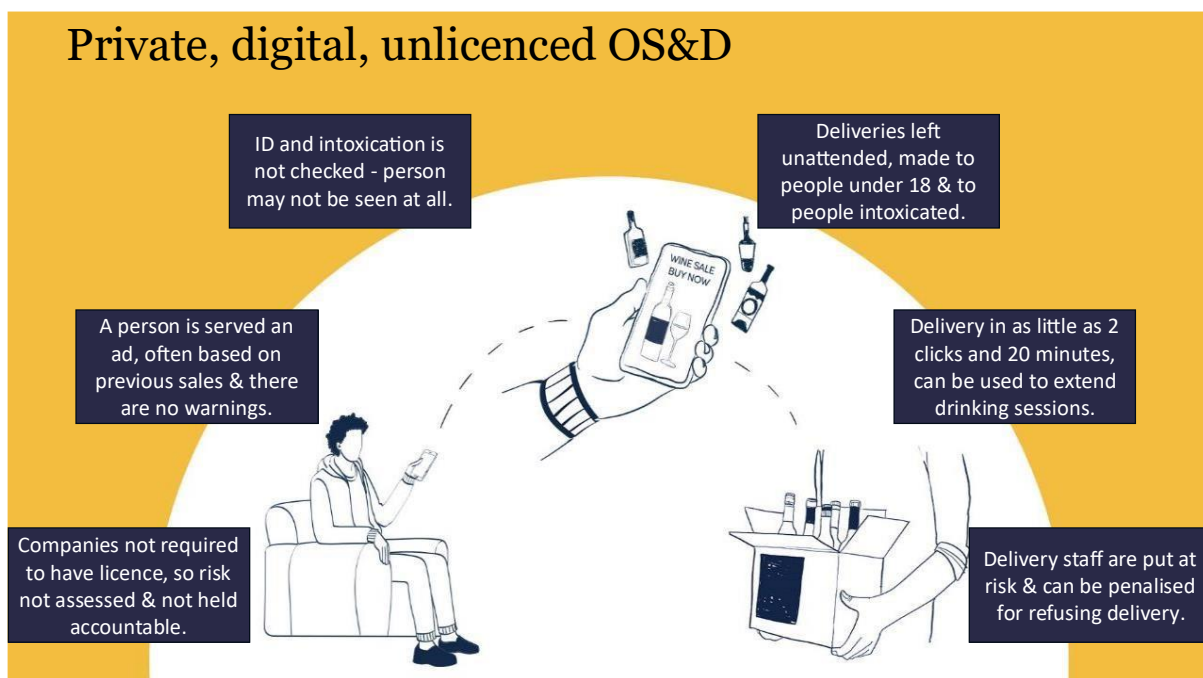
Public, physical, 'bricks & mortar' licenced premises



However, with OS&D into homes, these two points of sale and supply are separated, often undertaken by different companies, and mostly done in private. This creates two points at which there is an increased risk of a person under 18-years-old having access to alcohol.

Online transactions and delivery have caused significant disruption to this venue-based context. Alcohol companies can now advertise a product through multiple digital platforms, push fast purchases via Apps or websites, and then deliver alcohol within two clicks and 30 minutes in some areas. This means alcohol is more readily available and accessible than ever before. This disrupted context with inadequate oversight means the sector is not regulated to the same standard as traditional physical venues, (ie. pubs, clubs, bars and bottle-shops).

Private, digital, unlicenced OS&D



In 2022, the WA Government introduced OS&D regulations that prohibited same day deliveries from being left unattended or with a person under 18, and required the person accepting the delivery to provide a valid ID. Having previously done two audits before and after the changes, Cancer Council WA conducted a third audit of 49 OS&D retailers from July to September 2024.²⁴

This had the aim of monitoring changes among OS&D retailers and identifying opportunities to reduce the role of alcohol in domestic and family violence. The results were as follows:

- **Rapid delivery:** 19% offered rapid (< 2 hour) delivery in Perth,
- **Online ID checks:** none required online ID checks, 53% required self-reporting,
- **Unattended delivery:** 29% offered to leave next day deliveries unattended,
- **Delivery to intoxicated:** 31% would not deliver to a person who is intoxicated,
- **Promotional practices:** 61% offered a buy now, pay later option, and 22% suggested additional alcohol purchases at the checkout,
- **Self-exclusion:** 76% did not offer an option to self-exclude from their website.

These results demonstrate that alcohol is sold online without ID checks, and despite what the alcohol industry claims, it can still be left unattended and delivered to people who are intoxicated. This reinforces the urgent need for effective, comprehensive government regulation of OS&D, rather than a piecemeal approach or ineffective self-regulation.

Regulation of OS&D

Governments need to ensure that alcohol companies comply with effective, evidence-based measures that achieve harm reduction policy objectives in this changed context. Across Australia, the regulation of OS&D has not kept pace with rapid changes in how alcohol is sold and delivered. Un-enforceable, voluntary, self-regulation codes of practice are without any real consequences and are inadequate and ineffective.

The **Fact Sheet** proposes ‘aligning regulation of online sales and delivery of liquor with premises-based sales’. This reform must introduce effective regulation for the fundamentally different context of OS&D, bringing its regulatory oversight up to a similar standard as physical premises. This means regulating the different risks of OS&D, not applying the same regulations as physical outlets. The harm minimisation measures needed across the six areas are shown in the diagram below:

1. Prevent late night (after 10pm) and rapid (less than 2-hour) delivery
2. Implement (sales and delivery) ID checks and offences
3. Prevent harmful marketing
4. Enforce compliance and data collection (sales and delivery)
5. Improve licencing and risk factors
6. Protect delivery staff, (delivery-specific RSA, companies liable, not penalise drivers)



Currently, the Liquor Licensing Act makes no distinction between same day and non-same day deliveries. This reflects the evidence that, except for rapid (less than 2-hour) delivery, the risks of alcohol harms are the same regardless of the delivery timeframe, that is, delivery to people who are intoxicated, delivery to children and deliveries left unattended.

Any new measures should retain this scope and apply to all types of alcohol delivery (same day and non-same day), given that the risk of unattended, late night, intoxicated and underage delivery is the same for non-same day delivery. The “*Review of the NSW Alcohol Delivery Reforms – Stage 1*” findings noted evidence of non-same day delivery to people under 18.²⁵

Recommendation 2. Apply the scope of all online sales and delivery measures to all deliveries of alcohol, not just same day delivery.

Prevent late night and rapid delivery

The **Tasmanian Treasurer’s invitation letter** asked: “*What are your views about the current and future availability of liquor, including: b) Delivery of liquor, including rapid and same day delivery - for example, are there any reasons why delivery of liquor should be restricted such as certain times of day or minimum delays between order and delivery?*”

Multiple independent expert bodies have recommended preventing late night and rapid delivery of alcohol. The expert-led ‘*Rapid Review*’ report recommended governments review and strengthen alcohol laws by **limiting alcohol sales and delivery timeframes**.²⁶ The SA Royal Commission into Domestic, Family and Sexual Violence (DFSV) recommended immediate adoption of the *Rapid Review* measures, including a **2-hour safety pause** between order and delivery and **restricting online sales and delivery timeframes**.²⁷ In addition, a Victorian Coroner also called for a **2-hour safety pause**.²⁸

The risk of alcohol harm increases later at night. Evidence shows that alcohol-related family violence and suicides peak late at night in the home:

- Extending takeaway alcohol sales operating hours from 10pm to 11pm was associated with a statistically significant increase of an estimated 1,120 domestic violence assaults in the 38 months following the extension.²⁹
- Alcohol-related assaults increase substantially between 6pm and 3am, with 37% of these assaults occurring in the home and 57% of those being family violence.³⁰
- Suicides and sudden or unnatural deaths involving alcohol predominantly happen at night, in the home environment.³¹

Recommendation 3. Establish a delivery timeframe from 10am to 10am to prevent late night delivery. This reduces the risk of alcohol-related domestic, family and sexual violence and suicide, which increases later at night.

Rapid alcohol delivery fuels higher risk alcohol use and contributes to people ‘topping up’ when they normally would have stopped drinking, this increases the likelihood of higher-risk alcohol use. Evidence demonstrates that rapid delivery enables impulsive purchases and enables continuation of an existing alcohol session when the alcohol supply has been exhausted:

- One in five Australian adults who use popular alcohol delivery sites used a service to continue a home drinking session.³²
- Of people ordering rapid delivery, 38% drank more than 10 standard drinks on that occasion.³³
- 77% of people who ordered rapid delivery would have stopped if it was unavailable.³⁴

As a result of this expert advice and research evidence, multiple jurisdictions are in different stages of implementing the 2-hour safety pause. In December 2023, the WA Department of Local Government, Sport and Cultural Industries proposed a 2-hour safety pause between alcohol order and delivery to the Harm Minimisation Working Group on Liquor Reform. In

December 2024, the SA Government released a draft Liquor Licensing Amendment Bill that included the introduction of a 2-hour safety pause between the order and delivery. In October 2025, the ACT Government tabled the Liquor Amendment Bill 2025 that included the 2-hour safety pause.

Recommendation 4. Introduce a 2-hour safety pause between the order and delivery of alcohol. This prevents rapid delivery which contributes to higher-risk alcohol use when drinking sessions are extended.

Effective ID checks at point of sale and point of delivery

Currently in Tasmania, it is an offence to deliver alcohol to a person under 18 years old. However, there is no effective form of ID checks specified, so companies can deliver alcoholic products without effectively verifying age at point of sale or delivery, putting children at greater risk. Delivery of alcoholic products without age verification creates a risk that alcoholic products will be left unattended or accessed by a child. There is recent evidence that this continues to occur:

- 22% of people had their delivery left unattended at the door, and 50% did not have to show ID to prove they were over 18.
- 24% of alcohol orders were delivered to research assistants who looked younger than 18 years, without an ID check.
- 1 in 10 drivers were unaware of age and ID checks, and 7 out of 25 covert compliance checks failed to verify point of delivery ID.

Currently in Tasmania, it is an offence to ‘supply’ liquor to a person under 18 years old, however, age restrictions are only specified for supply at premises only.

Recommendation 5. Require digital proof of age, as an effective ID check for online point of sale. Require an effective ID check on every delivery.

Prohibited offences

The rapidly expanding OS&D of alcohol creates new risks of harms through the OS&D of alcohol to people under 18 years old, and to people who are intoxicated. To ensure delivery companies comply with requirements not to sell or deliver to people under 18 years old, appropriate offences need to be prescribed. The OS&D of alcohol also creates new risks of harms to delivery staff, through the delivery of alcohol to people who may be intoxicated.

- A 2022 study found that a quarter of respondents had alcohol delivered while intoxicated, 75% of whom were never or only sometimes refused delivery.³⁵
- 61% of Victorians using rapid delivery weekly said they were regularly intoxicated when receiving their alcohol delivery, (and were still given the order).³⁶

A key protection for delivery staff is to support them with the right to refuse delivery to a person who is intoxicated. Currently in Tasmania, the offence to *sell or serve* liquor to an intoxicated person, is for supply at a licensed *premises* (s78).

Recommendation 6. Establish an offence for the selling alcohol to people under 18 years old, (separate to the offence for delivering to people under 18 years old).

Recommendation 7. Establish an offence for leaving an alcohol delivery unattended. Establish an offence for delivering alcohol to a person who is intoxicated.

Delivery-specific responsible service of alcohol (RSA) training

The Liquor Licensing Reforms Fact Sheet proposes the following specific changes:

- “Requiring a regular review of the Responsible Service of Alcohol training framework and introduce the ability for refresher training”

As discussed above, OS&D represents a significant shift from public, physical, licenced premises to a private, digital, unlicenced context. This shift creates unique risks for delivery staff. Delivery employees are not inside a venue, like bottle shop staff, but alone on a person’s private property without other colleagues or security staff.

Responsible service of alcohol (RSA) training is only one element in preventing alcohol supply to children or people who are intoxicated. Despite the emphasis placed on mandatory RSA training across Australia, there is little evidence that training alone reduces the likelihood of sale of alcohol to people who are intoxicated.³⁷ It only has some effect when combined with strong regulation, compliance testing, penalties and strict enforcement. Current RSA training is designed for alcohol supply on public premises, much of it is not appropriate for the delivery of alcohol in private spaces.

Delivery-specific RSA needs to be designed, prescribed and monitored with record-keeping of refusals and test purchasing. The training needs to include training covering family violence. The findings of the “Review of the NSW Alcohol Delivery Reforms - Stage 1” indicated drivers asked for more plain English, and more support with de-escalation and communication.³⁸ Delivery staff need to be supported so that they understand their role, rights and responsibilities including with refusing delivery of alcohol, and with responding appropriately to family violence.

Recommendation 8. Require delivery staff to undergo *delivery-specific* Responsible Service of Alcohol (RSA) training. This ensures they are safe and understand their role, rights and responsibilities in refusing delivery of alcohol, as well as how to respond appropriately to potential family violence situations.

Not penalise staff and ensure companies are liable

With the shift to a private, digital, unlicenced contexts delivery staff must be supported and legally protected from being penalised for delivery refusal, in compliance with their legal obligations, with companies ultimately being held liable for breaches (such as deliveries outside of hours or in breach of a 2-hour safety pause). The findings of the NSW “Review of the Alcohol Delivery Reforms - Stage 1” indicated that 10% delivery drivers felt unprotected from being penalised, with nearly 1 in 10 who refused a delivery, having been penalised by their employer.

Recommendation 9. Clarify that delivery companies are liable for delivery breaches, (such as deliveries outside of hours or in breach of a 2-hour safety pause).

Recommendation 10. Prohibit delivery companies from imposing a penalty on employees or delivery agents complying with their legal obligations by not completing a delivery, or for refusing delivery.

3. Risk-based licensing

The Liquor Licensing Reforms Fact Sheet proposes the following specific changes:

- “Introducing risk-based application and licence fees - lower risk activities are easier to apply for and approve and higher risk activities get more attention”

The purpose of risk-based licencing (RBL) is to align licensing fees and conditions with evidence of the risks of alcohol harm. Since 2010, the ACT has calculated and set liquor licensing fees according to the risk factors of venue type, occupancy and trading hours. RBL was found to contribute to a decline in the number of alcohol-related offences in the ACT by 25%.³⁹ Risk-based licensing must incorporate all evidence-based risk factors, (trading hours, patron capacity, density and proximity, and compliance history). RBL should include increasing fees for higher risk licenses, not just reducing fees for lower risk licenses.

Location (density and proximity) as a risk factor

There is substantial evidence to demonstrate that the density of liquor outlets contributes to an increase in alcohol harm.^{40,41} A study by the NSW Bureau of Crime Statistics and Research found that “*the concentration of hotel licences in a local government area, particularly at higher density levels, was strongly predictive of both intimate partner and non-intimate partner assault rates*”.⁴² Additionally, the World Health Organization has highlighted that neighbourhoods which have higher densities of alcohol outlets (both on- and off- license) also have greater child maltreatment problems.⁴³ These neighbourhoods are also more socially disadvantaged with fewer resources available to support families. This situation can lead to increased stress for families and restrict development of social networks that can prevent child maltreatment.

The rapid growth of online sales and delivery of alcohol introduces new risks of alcohol harm, including increased availability, accessibility, density of alcohol supply, and rapid and unsupervised delivery. The Tasmanian Liquor Licensing Act currently has no requirements about calculating supply density that include OS&D sales.

Recommendation 11. Incorporate all risk factors of alcohol harm into the calculation of risk ratings and license fees, to ensure that risk-based licensing accurately reflects the risk of alcohol harm. These include business activity, trading hours, patron capacity, location (density and proximity), and compliance history.

Recommendation 12. Ensure that within risk-based licencing, higher risk licenses have increased license fees and stronger conditions, (not just lower risk licenses having reduced fees and conditions).

Recommendation 13. Incorporate both density and proximity risk factor calculations to accurately reflect the higher risks of higher venue density and proximity.

Recommendation 14. Establish a risk-factor for online sales and delivery to accurately reflect its increased risk of harms. Incorporate a risk factor for supply density, (as an equivalent for outlet density), for online sales and delivery of alcohol in a geographic area. Consult alcohol policy experts on the development, implementation and evaluation of such a risk factor.

Number of liquor license categories

The **Liquor Licensing Reforms Fact Sheet** proposes the following specific changes:

- “*Replacing the existing licence and permit categories to allow greater flexibility and tailoring of the authority to reflect different business and community activities.*”

Any reduction in the number of liquor licence categories must not reduce the licence conditions for each category of risk. A priority of any system should be ensuring that the risk of harm from alcohol is not increased by any changes. Every ‘simplification’ that reduces regulatory oversight favours Applicants over reducing the risk of alcohol harm in the community. The diversity of licenses needs to be fit for its purpose to regulate licensing to reduce risk of harm from alcohol. The license conditions that exist regarding how they sell and

supply alcoholic products for use off-premises, recognises the increased risk of off-premise use of alcohol.

Specific business structures of alcohol production, wholesale supply or retail sale, must not become loopholes in liquor licensing regulation. Any rollback of regulatory oversight must include evidence-based harm reduction strategies to offset the increased risk of alcohol harm. An existing license category being merged or transitioned to a new licence category must have evidence-based justification that associated risks of harms are also able to be adequately addressed. Any substantive change to the licencing conditions must include evidence-based harm minimisation justification or mitigation measures put in place to offset the erosion of measures to reduce alcohol harm. Evidence must be provided showing substantive changes to the licence conditions have no negative impact on the risk of harm before changing the licence conditions.

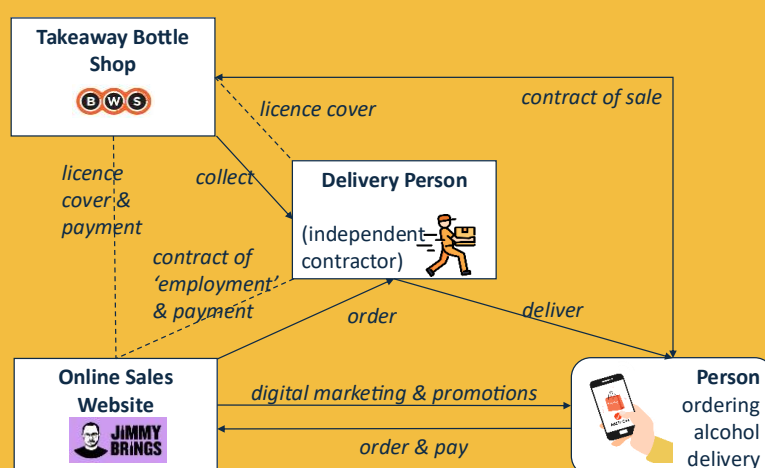
Recommendation 15. Ensure that any new license categories include additional community consultation requirements and evidence-based harm minimisation measures as conditions.

Recommendation 16. Commission independent research to determine the associated risks of harm from alcohol of different licence types and their conditions, before reducing or changing the license categories and subclasses.

Establish a licence category for OS&D

Currently, there is no licence category in the Liquor Licensing Act directly governing OS&D of alcohol. This means that a Tasmanian delivery provider does not need their own liquor licence, allowing delivery companies to operate under a separate company's licence. It also limits the ability of the Tasmanian Government to monitor their compliance, as there are less avenues for penalising breaches (such as loss of a licence). There can be up to three different commercial entities involved in online sales and delivery of alcohol in Tasmania. These include the online sales company, the licenced takeaway bottle shop that the alcohol is collected from, and the delivery driver, (often an independent contractor).

Behind the scenes of OS&D



The purpose of different licence categories is to reflect different business types, and align administration processes, compliance and licensing fees with these different business types, and with the different risks of alcohol harm for each. The most effective regulatory instruments

are those that can directly monitor and enforce compliance with the most relevant entities involved. Any commercial entity selling or delivering alcohol should hold a liquor licence themselves. Without this process, the Tasmanian Government has limited oversight of delivery companies and less compliance enforcement options.

Stretching existing licence conditions over fundamentally different business models will require multiple exclusions and exemptions. An integral part of this new licence category application process would be for it to trigger community consultation, as people in a local area where alcohol delivery is being expanded into, should be consulted. Without a specific OS&D licence category, there is no process that triggers public consultation for OS&D.

The Victorian Commission for Gambling and Liquor Regulation has developed such a licencing model for OS&D of alcohol, by establishing the category of *'Remote Seller'*.⁴⁴ This licence category applies to entities supplying alcohol to people not currently on the licenced premise, (including sales over the phone, via the internet or through an app), and delivered to customers to use off-premises. It has its own application processes and risk-based licence fees.

Recommendation 17. Establish a separate, specific liquor licence category for OS&D. This is to align the administration, licence fees and conditions with the risk of alcohol harm associated with OS&D. Require retailers, such as bottle shops and third-party delivery companies, to have and display this license to sell alcohol online or to deliver alcohol.

4. License and permit applications

The **Liquor Licensing Reforms Fact Sheet** proposes the following specific changes:

- *“Streamlining regulatory processes to minimise the regulatory burden on businesses.*
- *Modernising our systems and creating an online, trackable, application process.*
- *Removing advertising requirements for online sale and low risk applications*
- *10-day approval timeframes for low-risk activities.*
- *Introducing the ability to refund or reduce permit application fees”*

Genuine transparency and public participation

The Tasmanian Liquor Licensing Act requires decision-makers to consider the best interests of the community. A key means for doing this, is through effective public consultation, which involves all impacted members of a community having a role in liquor licensing decisions.

The current process already has a power imbalance that favours business interests over community. Companies have access to finances and resources to gain legal and other social planning advice and can run protracted appeals and defences. Impacted and concerned communities do not. Some community participants indicate that professional engagement processes feel intimidating or inaccessible when dominated by legal professionals.⁴⁵

Engagement with community stakeholders must include early, informed, transparent, and equitable participation in decision-making. For communities to effectively engage in licensing, they need to be appropriately informed and supported, and processes need to be transparent.

Independent support should be resourced and made available for communities who wish to engage in licensing processes. An advisory information service is needed, with staff that have expertise in licensing systems and an understanding of community needs and expectations. This would support individuals and communities in navigating and interacting with the liquor licensing system. A pilot of such a service operated in NSW as the Alcohol Community Action project (ACAP).⁴⁶ ACAP successfully assisted numerous communities to lodge objections to liquor licence applications and provided advice to individuals who were not aware of their rights when dealing with applications.

Recommendation 18. Prescribe an effective community impact process for OS&D, publishing full licence applications with risk-assessment management plans specific to OS&D. Ensure engagement with all relevant stakeholders, by providing resourcing for targeted and independent support for members of the public impacted by increases in alcohol supply.

5. License and permit conditions

The **Tasmanian Treasurer's invitation letter** asked:

"1) What are your views about the current and future availability of liquor, including:

a) Where liquor can be sold - for example should it remain limited to a principal activity test or should liquor be available for sale as part of a business with multiple or broader activities? (Reference Section 24A of the Liquor Licensing Act 1990).

c) Who should have access to or be exposed to areas selling liquor - for example, the current Act allows areas to be designated as 18 years and over or restricts access by minors to require a guardian (Reference Section 84 of the Liquor Licensing Act 1990).

d) Should there be limitations on accessing a licensed premises outside of the hours of liquor sales - for example, should people be allowed on a licensed premises when liquor sales are not allowable? (Reference Section 65 of the Liquor Licensing Act 1990)."

The **Liquor Licensing Reforms Fact Sheet** proposes the following specific changes:

- *"Streamlining regulatory processes to minimise the regulatory burden on businesses.*
- *Flexibility to amend the hours of operation of licences, subject to the community benefit*
- *Removing the restriction on who can enter and purchase liquor under a club licence*
- *Allowing a licence to be amended to accommodate a change of location, subject to assessment of location suitability*
- *Charging permit fees for only the number of days of the event*
- *Allowing licences to be held by a business, not just an individual.*
- *Introducing a 20-year licence period, with all licences to be reviewed at transfer allowing the 20-year period to re-start*
- *Removing restrictions on amending existing licences and permits*
- *Clarifying and naming the availability of a single permit for festivals and events with multiple vendors.*
- *Introducing an appeal right for changes to licence conditions."*

Extensive community harms are associated with alcohol and efforts to streamline regulations and industry burdens must not come at the expense of community safety. Alcohol is no ordinary commodity. It is a harmful product requiring regulatory controls, including licencing laws based on harm prevention, not on industry profits. The SA Royal Commission into DFSV recently called alcohol a '*commercial determinant of violence*', and the alcohol industry an '*industry that profits from harmful products*'.⁴⁷ Each of the many changes to licensing and permit conditions listed above are proposed with the sole purpose of reducing 'regulatory burden'. Only one of them provides the caveat 'subject to the community benefit'. The purpose of regulation is to keep the community safe, not to develop business or facilitate profits. These changes to established regulations must have evidence that they are not increasing the risk of harms, rather than simply provide financial benefits to harmful industries.

Recommendation 19. Ensure that any changes to licensing and permit conditions have evidence that they will not increase the risk of harm from alcohol before being implemented.

6. Preventing harmful marketing

Everyone should be able to enjoy the benefits of safely using digital technologies to work, learn, purchase and play. This can happen when we have safe digital environments that enable people's health and wellbeing. However, the extensive collection, use and disclosure of people's personal information is being used to fuel marketing practices that are harming the community, including the digital marketing of alcohol.⁴⁸ The more people order alcohol, the more they receive and are exposed to advertising online. There is evidence that alcohol companies are uploading data about young people to feed marketing algorithms.⁴⁹ The data-driven marketing model is *harmful by design* as the whole community are exposed to it. People with high levels of alcohol use are likely to be the most exposed, (this would include people trying to reduce their alcohol use or in recent recovery).⁵⁰

Preventing harmful digital marketing

The expert led '*Rapid Review of Prevention Approaches to End Gender-Based Violence*' report recommended governments review and strengthen alcohol laws, including by limiting alcohol advertising. While there are broader, federal alcohol marketing reforms needed, there are also state-based reforms that can be implemented such as restricting marketing like push notifications and buy now buttons.

An analysis of more than 50,000 alcohol advertisements from alcohol retailers on the Meta platforms (eg. Facebook and Instagram), over a period between 2021 and 2023, found that 84% of advertisements had a call-to-action button. Almost half (47%) of the advertisements by alcohol retailers on the Meta platforms with a call-to-action button directly linked to alcohol retail.⁵¹ This means that the purchase of alcohol begins within one click from the advertisement.

The Objects of the Liquor Licensing Act include "*restricting undesirable liquor promotion and advertising and the supply of certain liquor products*". Section 68 of the Act prohibits advertising or promotion that is likely to encourage irresponsible consumption of liquor. However, this does not currently extend to online sales. Section 46D requires that a licensee who sells liquor through an internet site must ensure that they display the license number but imposes no other requirements for online sales.

Recommendation 20. Extend the list of unacceptable promotional practices to the digital marketing of OS&D, including prohibiting retailers from offering delayed payment; sending direct prompts; 'buy-now' buttons or offering incentives for a minimum spend or volume.

Online health warnings

Australians have low awareness of the National Health and Medical Research Council's (NHMRC) Australian guidelines to reduce health risks from drinking alcohol.⁵² A recent, nationally representative poll found that most Australians surveyed (61%) report not being familiar with the content of the NHMRC Alcohol Guidelines.⁵³ As noted above, Section 46D requires that a licensee who sells liquor through an internet site must ensure that they display the license number but imposes no other requirements for information display for online sales, such as health-related information about the NHMRC Australian Alcohol Guidelines.

Recommendation 21. Require alcohol companies with online advertising to clearly display on their websites at least three prescribed rotating health warning statements about the risk of harm from alcohol, with a link to the Australian guidelines to reduce health risks from alcohol.

7. Compliance and data

Regulatory measures are only as effective as their corresponding compliance measures. As the Cancer Council WA audit results outlined above show, there is a need for the Tasmanian Government to support any legislative changes with strong compliance and enforcement work. Failure to provide this oversight risks retailers failing to comply, the changes being ineffective, and a failure to reduce the harms associated with OS&D.

In addition to legislating specific regulatory offences and penalties, there are other effective compliance monitoring measures that can be adapted for OS&D. These include improved OS&D data collection and reporting requirements, implementing test purchasing for OS&D, and designing, prescribing and monitoring delivery-specific RSA training. Each of these compliance provisions gives effect to the enforcement of the regulatory measures. This is the key benefit of government legislation and regulation, that it is enforceable, unlike ineffective industry self-regulation with no real consequences.

Collect, report and publish sales and delivery data

Accessible data and research evidence is needed to be able to establish, maintain and enforce effective alcohol laws. This allows better understanding of alcohol harms and improves liquor licencing decision-making. Most of this data comes from alcohol companies, much of which is already collected while doing business, or reporting to their industry lobby groups. The OS&D industry lobby group, Retail Drinks Australia, indicated they had access to sales data from nearly 9 million transactions.⁵⁴

This OS&D data, along with test purchasing, is necessary for monitoring the compliance of refusals (under 18, unattended or intoxicated). It is also needed to facilitate a more accurate calculation of the increase in alcohol supply density due to online delivery. The Tasmanian Government also needs to publish frequent reports on monitoring and enforcement activity.

Recommendation 22. Require retailers to collect data and keep records on the volume of alcohol sold geographically. This data should include alcohol *sold* online as well as *delivered* by geographic area. Publish regular sales and delivery data reports to enable research and compliance monitoring of sales. Collect only *postcode data*, not names or addresses of individuals.

Recommendation 23. Require retailers to collect data and keep records on deliveries refused because the recipient was under 18, did not provide evidence of age or was intoxicated. Publish regular reports on compliance and enforcement to enable research and monitoring of deliveries and frequency of issues. As above, this measure should collect only *postcode data*, not names or addresses of individuals.

Test purchasing

Compliance tests or controlled purchase operations (CPOs) are done to obtain evidence that may lead to the prosecution of a person for the offence of supplying liquor to child or young person. This can be done by involving a young person (a purchase assistant), under the supervision of an authorised person, purchasing, or trying to purchase, liquor from a licensee. This may involve the purchase assistant and the authorised person engaging in conduct that would normally be an offence against Tasmanian law but would be specifically exempted in the Act. The NSW government also used compliance test purchasing as part of its *Stage 1 Review of Alcohol Delivery Reforms*.⁵⁵

Recommendation 24. Implement, monitor and enforce compliance test purchasing including of OS&D. This is to test compliance of the prohibitions against delivering alcoholic products to people under 18, people who are intoxicated or deliveries being left unattended.

Conclusion

We commend the Tasmanian Government for considering Liquor Licensing Reforms that have the potential to address the harmful impacts of alcohol, like domestic, family and sexual violence, including by regulating online sales and delivery (OS&D). These reforms need to include evidence-based measures such as a safety pause between order and delivery and limiting late night deliveries of alcohol. Implementing such changes would prioritise the health and wellbeing of the community by enabling protections that prevent harms from alcohol.

We particularly highlight the need to implement the Rapid Review recommendation to specify gendered violence as part of making harm minimisation the primary object of the Act. We further recommend the Tasmanian Government pursue the Rapid Review recommendation to legislate to prevent unacceptable marketing practices of alcohol.

Other proposed changes to Liquor Licensing Applications and Licensing Conditions must prioritise community safety over industry profits. This will ensure that the reforms align with harm minimisation, prevent gendered violence, meet community expectations and allow the Tasmanian Government to prioritise the wellbeing of the Tasmanian community.

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